

WALTER D. NEALY, P.C. ATTORNEY AT LAW 100 South Van Brunt Street, Suite 2C Englewood, New Jersey 07631 Phone: (201) 227-0063 Fax: (201) 227-6118 Email: Nealylaw@gmail.com Attorney for Debtor	UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Case No. 18-23981-SLM Chapter 13 Hearing Date: November 28, 2018 Time: 8:30 am Judge: Stacey L. Meisel
In Re: Marcia A. Harris Debtor	RESPONSE TO OBJECTION OF DONALD V. BIASE, AS CHAPTER 7 TRUSTEE OF THE ESTATE OF GLOMAC TRUST, TO CONFIRMATION OF THE DEBTOR'S PROPOSED SECOND MODIFIED CHAPTER 13 PLAN

I, Marcia A. Harris, residing at 477 Elkwood Terrace, Englewood, New Jersey hereby say and certify as follows:

1. I am the Debtor in the within Chapter 13 Case which was filed on July 12, 2018. I have read the Certification of Milica A. Fatovich, Esq. of Hook & Fatovich, LLC, counsel to Mr. Biase dated November 21, 2018.
2. Paragraph 11 of Ms. Fatovich Certification indicates that I have not provided disclosure of my business income and "rental income derived from the Englewood property". This is untrue. I have provided detailed Profit and Loss Statements as required, to the Chapter 13 Trustee from my income and expenses from January 2018 to June 30, 2018.
3. This disclosure includes a personal Profit and Loss Statement as well as a Profit and Loss Statement from Dyolt, LLC. I have received no income relative to the "rents" paid via Airbnb to the Debtor, Glomac Trust, Case No. 18-16804-JKS.

4. I am requesting that the Confirmation Hearing scheduled for November 28, 2018 be adjourned so that a 341a Meeting can be conducted by the Standing Chapter 13 Trustee.
5. Paragraph 13 of the objection by Mr. Biase's counsel seeks cessation of rental activities by Glomac Trust in compensation for use of "commercial office space" and proof of adequate liability insurance for commercial activities including my consulting business.
6. With regard to cessation of rental activities, as Mr. Biase is aware, the rental activities are conducted by Glomac Trust. I am not a Trustee or Fiduciary in connection with Glomac Trust.
7. With regard to the activities of my consulting business, Dyolt, LLC at 477 Elkwood Terrace, Englewood, New Jersey, same consists of the use of a room at the property in which there is a desk a chair and a computer. I do not see patients or conduct business meetings at this location.
8. There is a homeowner's insurance policy which I am advised would provide adequate liability coverage. Further, I do maintain adequate professional liability insurance.
9. I would like to have the 341a Meeting in my case scheduled so that my Chapter 13 Case can be confirmed in the near future.

I hereby certify that the foregoing statements made by me are true. I understand that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 26, 2018

/S/ Marcia A. Harris

Marcia A. Harris, Debtor